

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MONIQUE GRIMES, as Personal
Representative of the Estate of
DAMON GRIMES, Deceased,

Plaintiff,

v

TROOPER MARK BESSNER,
TROOPER ETHAN BERGER, and
SGT. JACOB LISS,

Defendants.

Case No. 17-cv-12860

Hon. Gershwin A. Drain

consolidated with

Case No. 17-cv-13580

GEOFFREY N. FIEGER (P30441)
JAMES J. HARRINGTON, IV (P65351)
GINA U. PUZZUOLI (P37992)
Fieger, Fieger, Kenney & Harrington, P.C.
Attorneys for Plaintiff
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(248) 355-5555

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**PLAINTIFF MONIQUE GRIMES, AS PERSONAL REPRESENTATIVE
OF THE ESTATE OF DAMON GRIMES' REVISED WITNESS LIST**

NOW COMES Plaintiff, MONIQUE GRIMES, AS PERSONAL
REPRESENTATIVE OF THE ESTATE OF DAMON GRIMES, by and through
her attorneys, FIEGER, FIEGER, KENNEY & HARRINGTON, P.C., and states
that she may call the following witnesses at the time of trial:

1. Monique Grimes, c/o Counsel;

2. John Hughes, c/o Counsel;
3. Dezjanai Grimes, c/o Counsel;
4. Destiny Grimes, c/o Counsel;
5. Dezanique Grimes, c/o Counsel;
6. MoToya Jones;
7. Steve Cajar;
8. DQoune Gantt;
9. Terronica Logan;
10. Charnasia Jones;
11. Sierra Hall;
12. Ameia McBride;
13. Shakirah Sims;
14. Gail Wiley;
15. Duane Campbell;
16. Shyrel Denise Powell;
17. Vergil Smith;
18. Russell Woodruff;
19. Mrs. Walter;
20. Mrs. Fodder;
21. Defendant Former Trooper Mark Bessner;

22. Defendant Trooper Ethan Berger;
23. Michigan State Trooper Sgt. Jacob Liss;
24. Michigan State Trooper Lt. Shanon Banner;
25. Police Chief James Craig Detroit Police Department;
26. Lt. Michael Shaw - Michigan State Police;
27. Wayne County Assistant Prosecutor Matthew Penny;
28. Wayne County Assistant Prosecutor Maria Miller;
29. Wayne County Assistant Prosecutor Sara Young;
30. Dr. Werner Spitz (Medical Examiner/Toxicologist Expert);
31. Michigan State Police Commander Kriste Etue;
32. Wayne County Chief Medical Examiner Carl J. Schmidt (Expert);
33. Wayne County Assistant Medical Examiner David Moons;
34. Daniel S. Isenschmid, Ph.D. F-ABFT (Expert Forensic Toxicologist);
35. Michigan State Police Lt. Neil Donohue;
36. Tech Donovan Harden;
37. Lt. Brown;
38. Reginald Harvel - Wayne County Medical Examiner's Office;
39. Nurse Stacy Jutzy;
40. Bishop Ruffin - Compassion Funeral Home;
41. Jerrail Mantiv - Wayne County Medical Examiner's Office;

42. Sarah Avedschmidt, Wayne County Medical Examiner's Office;
43. Dr. Amrita Manasa Vempati;
44. Nurse Jennifer Destross;
45. Samuel Sanders;
46. Deborah Crall;
47. Nurse S. Jethzu;
48. Ann Harris Holmes;
49. Dr. El-Shazly;
50. Michigan State Police Lt. James Smiley;
51. Michigan State Police Sgt. Angela Hunt (Brighton Post);
52. Michigan State Police Lt. Thomas Declercq;
53. Michigan State Police Lt. Jeremy Brewer;
54. Michigan State Police Sgt. Scott Singleton;
55. Michigan State Police Sgt. Jeff Frasier;
56. Michigan State Police Sgt. James Bundshuh;
57. Michigan State Police Sgt. Kevin Lucidi;
58. Michigan State Police Sgt. Rebecca MacArthur;
59. Michigan State Police Lt. Denise Powell;
60. Michigan State Police Sgt. Todd Poppema;
61. Michigan State Police Sgt. Jeffrey Meyers;

62. Michigan State Police Trooper Fahad Qureshi ;
63. Michigan State Police Trooper Evan Rzeppa;
64. Michigan State Police Captain Beth Clark (Lab Division);
65. Michigan State Police Sgt. James Young (Video Analysis Unit);
66. Michigan State Police Sgt. Roger Hunt;
67. Michigan State Police Lt. Michael McCarthy;
68. Michigan State Police Trooper Chris Kurish;
69. Michigan State Police Captain Decker;
70. Michigan State Police Trooper Diondre Doaks;
71. Michigan State Trooper Dave Jeffries;
72. Michigan State Police Lt. Richard Sanchez;
73. Michigan State Trooper Nolan Pryzbello;
74. Michigan State Trooper Angela Bean;
75. Michigan State Trooper Matt Unterbrink;
76. Michigan State Trooper James Young;
77. Michigan State Trooper John Beafore;
78. Michigan State Trooper Dan Martin;
79. Michigan State Trooper Brennen Kelly;
80. Michigan State Trooper Roger Craig;
81. Michigan State Trooper Dave Skeans;

82. Michigan State Trooper Chrlene R. Gilbert Warner;
83. Michigan State Police Trooper Mike Sherry;
84. Michigan State Police Trooper Michael Klenner;
85. Michigan State Police Sgt. Michael Zarate;
86. Michigan State Police Lt. Rick Sekely;
87. Michigan State Police Dispatcher Rebecca Carcone Cook;
88. Lt. Jamar Rickett (DPD Communications);
89. Michigan State Police Lt. Greg Morenka;
90. Michigan State Police Sgt. Tracey Walton;
91. Michigan State Police Trooper Brandon Maletta;
92. Michigan State Police Jordan Enders;
93. Michigan State Police Trooper Jonathon Meyer;
94. Michigan State Police Trooper Jeremy Cupp;
95. Michigan State Police Trooper Lisa Smith;
96. Michigan State Police Lt. Jeff Amley;
97. Michigan State Police Dispatcher Jeff Polny;
98. Michigan State Police Sgt. Barry Schraeder
99. Michigan State Police Inspector Menna;
100. Michigan State Police Sgt. Sullivan;
101. Michigan State Police James Deline;

102. Regional Communications Center Unit Manager Juiwana Pickett;
103. Michigan State Police Lt. Mark Goff;
104. Michigan State Police Technician Amanda Roberts;
105. Michigan State Police Scientist Kathaleen Szczegielniak;
106. Michigan State Police Forensic Scientist Karl Suni;
107. Michigan State Police Forensic Scientist Michelle Ponschke;
108. Michigan State Police Lt. Nicole Bock;
109. Michigan State Police Scientist Kristy Sekedat;
110. Michigan State Police Sgt. Frasier;
111. Michigan State Police Sgt. Corriveau;
112. Michigan State Police Lt. Joseph Brodeur;
113. Michigan State Trooper Jay Morningstar;
114. Michigan State Police Sgt. James Young;
115. Michigan State Police Trooper Marc Bonneau;
116. Michigan State Police Trooper Terry;
117. Michigan State Police Trooper Rzeppa;
118. Dr. Janka;
119. Michigan State Police Analyst Casey Wyzlik;
120. Michigan State Police Detective Jeff Frasier;
121. Dispatcher McDaniels;

122. Dispatcher Haynesworth;
123. Dispatcher Kenyon;
124. Detroit Police Detective Enrique Jackson;
125. Detroit Police Supervisor Paul A. Warner;
126. Detroit Police Investigator Lance Sullivan;
127. Detroit Police Investigator Joshua E. Davis;
128. Detroit Police Supervisor Marc J. DeLuca;
129. Detroit Police Officer Hamad/Amad Abed;
130. Detroit Police Officer Daran Zhoud;
131. Detroit Police Officer Calvin Wilson;
132. Detroit Police Officer Owen Hall;
133. Detroit Police Supervisor Regina J. Allen;
134. Detroit Police Officer Sequoia Turner;
135. Detroit Police Officer Dejonte Rice;
136. Detroit Police Officer Dejon Terice;
137. Detroit Police Officer Nicholas Haupt;
138. Detroit Police Sgt. Lawrence Addison;
139. Detroit Police Officer Emily Stephenson;
140. Detroit Police Officer Aubrey Wade;
141. Detroit Police Officer Joseph Borkowski;

142. Detroit Police Officer Kimberly Buckner;
143. Detroit Police Officer J. Drake;
144. Detroit Police Officer Jalen Williams;
145. Detroit Police Officer Cameron. Boersma;
146. Detroit Police Officer L. Wilson;
147. Detroit Police Sgt. Todd Ebby;
148. Cynthia R. Stockard (Children's Advocacy Center);
149. Mike Hale;
150. Jordan Walker;
151. Amanda Michelle;
152. Nate Johnson;
153. Michigan State Trooper Jonathon Meyer;
154. Bryan Chiles (Technical Compliance Manager)*;
155. Michigan State Police Sgt. Paul Warner;
156. Michigan State Police Sgt. Peil;
157. Doug Sandberg (Full Throttle Sports);
158. Technician Chad Cook (Full Throttle Sports);
159. Dan Darga (Area Towing);
160. Sheena Edwards;

161. Witnesses identified by Sheena Edwards;

- a. Darnell;
- b. Javier;
- c. Joseph;
- d. Joi;
- e. Javier's brother;

162. Ariel Lassiter;

163. Arial Hauser;

164. Demond Williams;

165. John Harris;

166. Lella Jackson;

167. Joseph Fields;

168. Chuane Fields;

169. Ms. Toshanda Williams;

170. Jose Merditaj;

171. Marquitta Brown;

172. Javerer Bonnor;

173. Kenneth Bonnor;

174. Sharel Smith;

175. All potential witnesses identified in police reports, including, but not limited to: Lillian C. Hannah, Lionel James Moss, Lowanna Bostick, Diane Whitly, Kevin DeWayne Graham, Ronda Sturdivant, Paris Taylor, Booker Jackson, Brenda Morgan and Robert Koyl.

176. Diane Walton;

- 177. Levi Jones;
- 178. Sarah Griffith;
- 179. Courtney Griffith;
- 180. Lynol Moss;
- 181. Kevin Graham;
- 182. Robert Koyl;
- 183. Ms. Moran;
- 184. Kierra Evans;
- 185. Lillian Hannah;
- 186. Diamond Davis;
- 187. William Hunter;
- 188. Edward Varner;
- 189. Calvin Carter;
- 190. Donald Nowak;
- 191. Sharelle Brooklyn;
- 192. Michelle Brooklyn;
- 193. Diana Wilkerson;
- 194. Melissa Walker;
- 195. Joseph Fields;
- 196. Douglas Moran;

197. Brenda Cooper;
198. Doreen Thomas;
199. William Thomas;
200. Henry Coker;
201. Chalise Sawyer;
202. Mr. Don Hedgesreth;
203. Ms. Dunnigan;
204. Walter Martin;
205. Janice Jimmerson;
206. Darryl Jimmerson;
207. Satoya Jimmerson;
208. Stephanie Browning;
209. Melvin Rogers;
210. Janice McCoy;
211. Da'von Gibbons;
212. Da'vier Gibbons;
213. Mary Gibbons;
214. Denise Bork;
215. Robert Bork;
216. Tammie Boyd;

- 217. Larry Bowen;
- 218. Rhonda Hill;
- 219. Vandrie Dean;
- 220. Javier Bonner;
- 221. The Egglestons;
- 222. Debra Cole;
- 223. Ashley Snider;
- 224. Brian Fitch;
- 225. Tanisha Edwards;
- 226. Ebbie Edwards;
- 227. Teco Green;
- 228. Alexandra Hart;
- 229. Melissa Monique;
- 230. Marcus Hatcher;
- 231. Kendra Smith;
- 232. Chris Osepchuk;
- 233. Mary Guest;
- 234. Terrance Jones;
- 235. Brenda Morgan;
- 236. Lowanna Bostick;

- 237. Paris Nicole Taylor;
- 238. Booker Jackson;
- 239. Rhonda Studivant;
- 240. Derek Sims;
- 241. Nefititi Carter;
- 242. Tavern Colston;
- 243. Ervin Colston;
- 244. Kevin Gant;
- 245. Latayia Robinson
- 246. Destiny Robinson;
- 247. Danyale Mason;
- 248. Christina Quaker;
- 249. Marcia Cottledge;
- 250. Mario Gray;
- 251. Latacia Haythorn;
- 252. Stephen Ross;
- 253. Antoinette English;
- 254. Debra Cockerhorn;
- 255. Eugene Jubenville;
- 256. Kierra Evans;

- 257. Anthony Harris;
- 258. Darnell Williams;
- 259. Green Smith;
- 260. Brooklyn Smith;
- 261. Nate Gibson;
- 262. Dr. Gerald Shiener (Potential Psychiatry Expert);
- 263. Any and all EMS Attendants at the scene;
- 264. Jamal Carver;
- 265. Any and all officers, deputies, state troopers, paramedics, medical staff and/or personnel who had involvement in this incident in any manner;
- 266. Any and all officers, deputies, troopers, prosecutors, investigators, administrators who investigated the incident;
- 267. Any and all individuals named in police reports, documents, witness lists, internal affairs investigations relating to this incident;
- 268. Any and all witnesses called to testify at the criminal trial and/or any criminal proceedings against Defendant Bessner and/or any Defendant herein;
- 269. All doctors, nurses, therapists, assistants, technicians, employees who had contact with Damon Grimes;
- 270. Any and all witnesses, including but not limited to, teachers, neighbors and/or friends of the Grimes Family;
- 271. All employees and/or representatives Compassion Funeral Home;

272. Keeper of the Records:

- a. Michigan State Police;
- b. Attorney General's Office/State of Michigan;
- c. Michigan State Police Troopers' Association;
- d. Detroit Police Department;
- e. Wayne County Prosecutor's Office;
- f. Wayne County Medical Examiner's Office;
- g. Wayne County Circuit Court;
- h. Compassion Funeral Home;
- i. St. John Hospital & Medical Center;
- j. Canfield Equipment Company;
- k. Area Towing;
- l. Michigan Collegiate Middle and High School;
- m. Wayne County Circuit Court;
- n. Canton Police Department;
- o. AXON Corporation;
- p. Fisheye Camera;
- q. Full Throttle Motor Sports;
- r. Any and all police departments that have employed Defendants;
- s. Any and all doctors of Damon Grimes;
- t. AT&T;
- u. Verizon;
- v. Sprint;
- w. T-Mobile;
- x. All others made known through discovery;
- y. Any Keeper of the Records listed by Defendants.

273. Any and all inmates at Wayne County Jail who have knowledge and/or information relating to Defendant Bessner's incarceration;

274. Additional medical experts to be named;

275. Additional psychological experts to be named;

276. All witnesses listed by Defendants:

277. Any witnesses made known through further discovery or otherwise;

- 278. All witnesses named in police reports, jail records, court records, medical records, psychological treatment records, and any other records;
- 279. Michael Thompson (Potential Economic Expert)
Thompson Econometrics
2350 Franklin Road, Suite 200
Bloomfield Hills, MI;
- 280. Nitin Paranjpe, Ph.D. (Potential Economic Expert)
Martin M. Wing, Ph.D. (Potential Economic Expert)
2350 Franklin Road, Suite 200
Bloomfield Hills, MI;
- 279. Thomas G. Bereza (Potential Law Enforcement Consultant Expert);
- 280. Ken Katsaris (Potential Law Enforcement Expert);
- 281. Any and all 30(b)(6) witnesses identified and or deposed in this case;
- 282. Police Policy and Procedure Experts to be named;
- 283. Police Use of Force Experts to be named;
- 284. Any and all billers for medical care facilities providing services to Plaintiff's decedent;
- 285. All witnesses necessary for rebuttal;
- 286. All witnesses necessary to identify or authenticate any documents, records, or things;
- 287. All witnesses whose involvement in this case was not known or reasonably anticipated at the time of the filing of this Witness List;
- 288. Plaintiff reserves the right to add to or amend this Witness List as the need for or efficacy of addition or amendment is revealed in the further course of this litigation.

Respectfully Submitted,

/s/Gina Puzzuoli

GEOFFREY N. FIEGER (P30441)

JAMES J. HARRINGTON, IV (P65351)

GINA U. PUZZUOLI (P37992)

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Southfield, MI 48075

Dated: October 26, 2018

(248) 355-5555

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all participating attorneys.

/s/ Karen M. Fiema

Karen M. Fiema